

ANDREA T. MARTINEZ, Acting United States Attorney (9313)
AMANDA A. BERNDT, Assistant United States Attorney (15370)
Attorneys for the United States of America
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111
(801) 524-5682
amanda.berndt@usdoj.gov

JOHN PERSELL (Utah Bar #17298)
Western Watersheds Project
P.O. Box 1770
Hailey, ID 83333
Tele: (503) 896-6472
jpersell@westernwatersheds.org

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

WESTERN WATERSHEDS PROJECT,

Plaintiff,

v.

UNITED STATES FOREST SERVICE,

Defendant.

**JOINT MOTION TO STAY
PROCEEDINGS FOR 60 DAYS**

Case No. 4:19-cv-00097-DN-PK

Judge David Nuffer
Magistrate Judge Paul Kohler

The parties, through their undersigned attorneys, hereby jointly request that this matter be stayed for 60 days. A stay of this matter is sought because the parties are nearing a resolution of this matter, but need additional time to finalize that potential resolution and to obtain necessary approvals.

Should these efforts not result in a finalized settlement, the parties will notify the Court at the end of the 60-day period and the United States Forest Service will file its agency statement pursuant to DUCivR 7-4(a)(2)(B) no more than seven days after notification.

WHEREFORE, the parties respectfully request that this matter be stayed for 60 days.

Respectfully submitted this 30th day of July 2021.

ANDREA T. MARTINEZ
Acting United States Attorney

/s/ Amanda A. Berndt
AMANDA A. BERNDT
Assistant United States Attorney

*Attorneys for Defendant United States
Forest Service*

/s/ John Persell (signed with permission)
JOHN PERSELL

*Attorney for Plaintiff Western
Watersheds Project*